

July 26, 2021

**VIA ECF**

The Honorable Jesse M. Furman  
U.S. District Court for the Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *City of Providence, Rhode Island v. Bats Global Markets, Inc.*, Case 1:14-cv-02811-JMF—**Letter Motion for Leave to File Under Seal**

Dear Judge Furman:

We write pursuant to Section 6 of the Court’s Electronic Case Filing Rules & Instructions and Your Honor’s Individual Rules of Practice to respectfully seek leave to file under seal certain materials (the “Protected Materials”) in connection with Defendants’ forthcoming Joint Opposition to Plaintiffs’ Motion for Class Certification (ECF 617) (the “Opposition”). Defendants’ Opposition and supporting materials will be filed later today, July 26, 2021.

The Protected Materials include exhibits filed in support of the Opposition, including an expert report. These Protected Materials consist of documents or references to documents that were (i) designated by Plaintiffs or Third Parties as “Confidential” or “Highly Confidential” under the Court’s Protective Order (ECF No. 402), or (ii) contain Defendants’ proprietary business information.

Defendants intend to promptly file public versions of the Opposition and the expert report, in which the Protected Materials and references thereto are redacted.

Accordingly, Defendants respectfully request leave to file the Protected Materials under seal and to redact the corresponding references in the Opposition.

Respectfully submitted,

By: /s/ Steven M. Shepard

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